

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:	CASE NO. 6:15-bk-3459-CCJ
TIRECO, INC.,	CHAPTER 11
Debtor.	HEARING ON CONFIRMATION SCHEDULED FOR THURSDAY, AUGUST 13, 2015 AT 2:00 P.M.

SUMMARY OF FINAL APPLICATION OF JUSTIN M. LUNA
AND THE LAW FIRM OF LATHAM, SHUKER, EDEN & BEAUDINE, LLP,
FOR AWARD OF ATTORNEYS' FEES i/a/o \$22,303.00
AND REIMBURSEMENT OF EXPENSES i/a/o \$1,337.18
NOTICE OF ESTIMATED FEES THROUGH CONFIRMATION i/a/o \$7,000.00

Applicant's Name:	Latham, Shuker, Eden & Beaudine, LLP
Applicant's Address:	111 N. Magnolia Ave., Ste. 1400 Orlando, FL 32801
Role of Applicant:	Counsel for the Debtor-in-Possession
Certifying Professional:	Justin M. Luna
Date Petition Filed:	April 21, 2015
Date of Order Authorizing Employment <i>nunc pro tunc</i> to:	July 13, 2015 <i>nunc pro tunc</i> to April 21, 2015 (DE 61)
Date of Services Rendered:	April 21, 2015 through June 30, 2015
Gross Amount of Professional Fees for Application Period:	\$22,303.00
Gross Amount of Requested Reimbursement for Disbursements and Expenses for Application Period:	\$1,337.18
TOTAL GROSS AMOUNT REQUESTED FOR FEES AND DISBURSEMENTS:	\$23,640.18
Estimated Fees and Expenses for July 1, 2015 through August 13, 2015	\$5,000.00 (Fees) \$2,000.00 (Expenses)
TOTAL REQUEST FOR FINAL AWARD FOR FEES AND DISBURSEMENTS (before deducting Advance Retainer of \$10,614.00):	\$30,640.18 (includes estimate)

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

In re:

CASE NO. 6:15-bk-3459-CCJ

TIRECO, INC.,

CHAPTER 11

Debtor.

**HEARING ON CONFIRMATION SCHEDULED
FOR THURSDAY, AUGUST 13, 2015 AT 2:00 P.M.**

**FINAL APPLICATION OF JUSTIN M. LUNA
AND THE LAW FIRM OF LATHAM, SHUKER, EDEN & BEAUDINE, LLP,
FOR AWARD OF ATTORNEYS' FEES i/a/o \$22,303.00
AND REIMBURSEMENT OF EXPENSES i/a/o \$1,337.18
NOTICE OF ESTIMATED FEES THROUGH CONFIRMATION i/a/o \$7,000.00**

JUSTIN M. LUNA and the law firm of LATHAM, SHUKER, EDEN & BEAUDINE, LLP, ("Applicant" or "Latham Shuker"), as counsel for Tireco, Inc. (the "Debtor"), hereby submits its final application for award of compensation ("Final Application") for services in the amount of \$22,303.00, and reimbursement of actual expenses in the amount of \$1,337.18 for the period commencing April 21, 2015 through June 30, 2015 ("Application Period"), and for approval of estimated fees and expenses in the amount of \$7,000.00 for the period July 1, 2015 through August 13, 2015, the date set for the hearing on confirmation ("Confirmation Hearing") of Debtor's Second Amended Plan of Reorganization ("Plan"), and, in support thereof, states:

1. On April 21, 2015 (the "Petition Date"), Debtor filed a voluntary petition for reorganization under Chapter 11 of the Bankruptcy Code. No trustee has been appointed, and the Debtor continues to operate its business as a debtor-in-possession.

2. On July 13, 2015, the Court entered an order granting the Debtor's application to employ Applicant as counsel for the Debtor (Doc No. 61), *nunc pro tunc* to April 21, 2015.

3. Prior to the commencement of this case, the Debtor paid an Advance Fee of \$10,614.00 for post-petition services and expenses in connection with this case. The Advance Fee will be applied against allowed fees and expenses on a monthly basis, but subject to final review and approval from the Court.

4. Since the Petition Date, Applicant facilitated the Debtor's continued operation as a debtor-in-possession to preserve the going-concern value of the Debtor's assets by obtaining Court approval to use cash collateral, pay the outstanding prepetition wages of employees and officers, and assisting the Debtor with preparation of the financial reporting required by the Court and United States Trustee.

5. Applicant seeks allowance of fees for services provided to the Debtor in the following areas of representation:

<u>Matter</u>	<u>Fees Incurred</u>	<u>Total Hours</u>
General Representation (001)	\$ 6,063.00	28.5
Schedules (002)	\$ 4,173.00	20.5
Cash Collateral (003)	\$ 2,034.00	9.5
Professional Retention (004)	\$ 512.00	3.2
Plan of Reorganization (005)	\$ 8,881.00	32.4
Claims (006)	\$ 480.00	2.8
Secured Creditor (007)	\$ 160.00	1.0
TOTALS	\$ 22,303.00	97.9

6. Attached hereto as Exhibit A is a table which sets forth the hourly rate, number of hours, and total fees for each professional or paraprofessional who has provided services in this case. The above items are allocated to each of the areas of representation which are described in the succeeding paragraphs. The nature of the representation provided by Applicant in the specific areas of representation is as follows:

a. General Representation (001): In the area of general representation, on-going services were provided in regard to general organizational matters which include the following:

- (1) Prepare for and attend hearings on all initial pleadings;
- (2) Consult with the Debtor and review of Debtor's compliance with all applicable bankruptcy rules and Court requirements and the United States Trustee guidelines concerning bank accounts and tax returns;
- (3) Work with the Debtor on preparation of the Debtor-in-Possession monthly financial reports and review of each of those monthly reports;

(4) Consult with the Debtor concerning various operating issues, including day-to-day operations of the Debtor, and negotiations regarding adequate assurance of payment to utilities and work with trade vendors to ensure business relationships continued post-petition;

(5) Prepare representative of Debtor for §341 meeting of creditors and attend the same; and

(6) Prepare and file all appropriate motions to comply with applicable Bankruptcy Code Sections and Rules of Procedure.

b. Schedules (002): In this area, Latham Shuker prepared the schedules and statement of financial affairs, and amendments thereto, from information furnished by the Debtor.

c. Cash Collateral (003): In this area, Latham Shuker prepared and filed the pleadings related to Debtor's request to use cash collateral, assisted Debtor in the preparation of its post-petition budget, and attended related hearings.

d. Professional Retention (004): On-going services included preparation of the employment application, accompanying verified statement, order, and fee application with respect to the retention of Latham, Shuker, Eden & Beaudine, LLP, as counsel for Debtor.

e. Plan & Disclosure (005): The services rendered in this area primarily consisted of the following and discuss potential reorganization and liquidation issues:

(1) Discussions with Debtor regarding plan ("Plan") proposals and related issues;

(2) Drafting of the initial disclosure statement and Plan of Reorganization;

(3) Negotiations with TD Bank, the secured creditor to reach agreement on the terms of Plan treatment, resulting in the proposal of a consensual Plan by the Debtor and TD Bank;

(4) Discussions with Debtor regarding Plan feasibility issues.

f. Claims (006): The services rendered in this area consisted of initial review of claims filed; and

g. Secured Creditor (007): Latham Shuker prepared and filed the notice in the related state court matter staying the proceeding pending the outcome of the bankruptcy.

7. Applicant submits that given (a) the time and labor required of Applicant, (b) the complexity of Debtor's estate and previous business relationships, (c) the novelty and difficulty of many of the issues involved, (d) Applicant's customary fees for such work, (e) the contingency nature of the work performed, (f) the time limitations and pressure borne by Applicant, (g) Applicant's experience, reputation and ability, (h) awards in similar circumstances, and (i) the results obtained, the compensation sought in this Application is both fair and reasonable.

8. In considering the foregoing criteria in this case, several matters should be noted:

a. This Chapter 11 case involves a Debtor who filed its bankruptcy petition due to, among other things, the loan maturity with TD Bank and a prepetition-negotiated settlement.

b. In providing services in this case, a conscious effort was made by Latham Shuker not to internally over staff the case within Latham Shuker's law firm. Wherever possible, associate and paralegal time has been used;

c. Latham Shuker is comprised of established and experienced commercial, litigation, real estate, and corporate attorneys. Each of the attorneys has an excellent reputation throughout Florida in the legal areas required by this case; and

d. The hourly rates charged by the attorneys of Latham Shuker are reasonable and within the range of fees normally charged for services of this kind rendered in similar cases.

9. The total compensation and reimbursement of fees and expenses requested by Applicant for the Application Period is \$23,640.18. As shown on Exhibit A, this reflects a total of \$22,030.00 for services rendered by Applicant resulting from the expenditure of 97.9 hours during the Application Period (a blended hourly rate of approximately \$228 per hour). In this regard, attached to the original of this Application filed with the Court as Exhibit B is a detailed breakdown of the time entries for each of the professionals providing services during the Application Period. Copies of the time records are available upon request to Justin M. Luna.

10. Applicant also requests approval of the reimbursement of actual expenses in the amount of \$1,337.18 as more particularly described in Exhibit C.

11. Applicant believes that approximately 21.9 additional hours of professional services will be needed for the period July 1, 2015 through August 13, 2015, billed at a blended hourly rate of \$228 for a total of \$5,000.00. Also, Latham Shuker estimates an additional \$2,000.00 in expenses for such period will be incurred. Latham Shuker requests approval of compensation and expenses, and reimbursement of the estimated amounts through August 13, 2015.

12. The professionals or paraprofessionals working on behalf of Applicant in this Chapter 11 case are the following:

a. Justin M. Luna is a partner in the bankruptcy department of Latham, Shuker, Eden & Beaudine, LLP, with more than eight years' experience in the area of bankruptcy law.


b. Christopher R. Thompson is an associate in the bankruptcy department of Latham, Shuker, Eden & Beaudine, LLP, with more than five years' experience in the area of bankruptcy law.

c. Diane L. Crivello is a paraprofessional in the bankruptcy department of Latham, Shuker, Eden & Beaudine, LLP, with more than thirty years' experience in the legal profession and nineteen years' experience in the area of bankruptcy law.

13. Attached has **Exhibit D** hereto, is Applicant's affidavit in support of the Application.

WHEREFORE, Applicant requests: (i) that it be awarded compensation for services in the amount of \$22,303.00 and reimbursement of expenses in the amount of \$1,337.18 for a total request of \$23,640.18 for the period of April 21, 2015 through June 30, 2015; (ii) approval of the estimated fees and costs in the amount of \$7,000.00 for the period July 1, 2015 through August 13, 2015; and (iii) for such other and further relief as is just and proper in the circumstances.

RESPECTFULLY SUBMITTED this 20TH day of July 2015.


Justin M. Luna
Florida Bar No. 0037131
jluna@lseblaw.com
bknotice1@lseblaw.com

LATHAM, SHUKER, EDEN & BEAUDINE, LLP
P.O. Box 3353 (32802-3353)
111 N. Magnolia Ave., Ste. 1400
Orlando, Florida 32801
Tel: 407-481-5800
Fax: 407-481-5801

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

CASE NO. 6:15-bk-3459-CCJ

TIRECO, INC.,

CHAPTER 11

Debtor.

HEARING ON CONFIRMATION SCHEDULED
FOR THURSDAY, AUGUST 13, 2015 AT 2:00 P.M.

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of FINAL APPLICATION OF JUSTIN M. LUNA AND LATHAM, SHUKER, EDEN & BEAUDINE, LLP, FOR AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES AND NOTICE OF ESTIMATED FEES THROUGH CONFIRMATION, together with any exhibits, has been furnished by electronic and U.S. First Class mail, postage prepaid, to: Tireco, Inc., Attn: Monica Jones, 2600 W SR 434, Longwood, FL 32779; Eric Golden, Esq., Burr & Forman LLP, a/fTD Bank N.A., 200 S. Orange Avenue, Suite 800, Orlando, Florida 32801; the 1007-2 Parties-in-Interest list, as shown on the matrix attached to the original of this notice filed with the Court; and the U.S. Trustee, 400 W. Washington Street, Suite 1100, Orlando, Florida 32801, this 20th day of June 2015.


Justin M. Luna, Esq.

Label Matrix for local noticing
113A-6
Case 6:15-bk-03459-CCJ
Middle District of Florida
Orlando
Fri Jul 17 09:45:22 EDT 2015

Tireco, Inc
2600 West State Road 434
Longwood, FL 32779-4446

Advanced Auto Parts
P.O. Box 742063
Atlanta, GA 30374-2063

Bank of America
P.O. Box 660807
Dallas, TX 75266-0807

Bridgestone Americas
P.O. Box 730529
Dallas, TX 75373-0529

Don Reid Ford
1875 S. Orlando Ave.
Maitland, FL 32751-6668

Duke Energy
P.O. Box 1004
Charlotte, NC 28201-1004

Greenway Dodge Chrysler Jeep
9051 E. Colonial Drive
Orlando, FL 32817-4176

Holler Honda
P.O. Box 1720
Winter Park, FL 32790-1720

Radiator Depot
P.O. Box 3497
Kansas City, KS 66103-0497

Securities Exchange Commission
175 West Jackson Street
Suite 900
Chicago IL 60604-2908

Seminole City Water & Sewer
P.O. Box 958443
Lake Mary, FL 32795-8443

TCI
P.O. Box 742237
Atlanta, GA 30374-2237

TD Bank, N.A., a national banking associatio
c/o Eric S. Golden, Esquire
Burr & Forman LLP
200 S. Orange Avenue, Suite 800
Orlando, FL 32801-6404

TD Bank, N.A., a national banking associatio
c/o Michael A. Nardella, Esquire
Burr & Forman LLP
200 S. Orange Avenue, Suite 800
Orlando, FL 32801-6404

TWW
P.O. Box 905944
Charlotte, NC 28290-5944

Waste Management, Inc. of FL
P.O. Box 105453
Atlanta, GA 30348-5453

Eric S Golden +
Burr & Forman LLP
200 S. Orange Avenue, Ste 800
Orlando, FL 32801-6404

Elena L Escamilla +
Office of the United States Trustee
400 W. Washington Street
Suite 1100
Orlando, FL 32801-2440

Justin M. Luna +
Latham, Shuker, Eden & Beaudine, LLP
P.O. Box 3353
Orlando, FL 32802-3353

Christopher R Thompson +
Latham, Shuker, Eden & Beaudine, LLP
111 N. Magnolia Avenue
Suite 1400
Orlando, FL 32801-2367

Note: Entries with a '+' at the end of the
name have an email address on file in CMECF

End of Label Matrix
Mailable recipients 21
Bypassed recipients 0
Total 21

EXHIBIT A

In re: Tireco, Inc.
Case No. 6:15-bk-3459-CCJ

General Representation (001)

<u>Timekeeper</u>	<u>Total Hours</u>	<u>Rate</u>		<u>Total</u>
Justin M. Luna	4.5	350	\$	1,575.00
Christopher R. Thompson	8.1	240	\$	1,944.00
Diane L. Crivello	15.9	160	\$	2,544.00
TOTAL	28.5		\$	6,063.00

Schedules (002)

<u>Timekeeper</u>	<u>Total Hours</u>	<u>Rate</u>		<u>Total</u>
Justin M. Luna	4.7	350	\$	1,645.00
Diane L. Crivello	15.8	160	\$	2,528.00
TOTAL	20.5		\$	4,173.00

Cash Collateral (003)

<u>Timekeeper</u>	<u>Total Hours</u>	<u>Rate</u>		<u>Total</u>
Justin M. Luna	1.4	350	\$	490.00
Christopher R. Thompson	3.1	240	\$	744.00
Diane L. Crivello	5.0	160	\$	800.00
TOTAL	9.5		\$	2,034.00

Professional Retention (004)

<u>Timekeeper</u>	<u>Total Hours</u>	<u>Rate</u>		<u>Total</u>
Diane L. Crivello	3.2	160	\$	512.00
TOTAL	3.2		\$	512.00

Plan & Disclosure (005)

<u>Timekeeper</u>	<u>Total Hours</u>	<u>Rate</u>		<u>Total</u>
Justin M. Luna	13.1	350	\$	4,585.00
Christopher R. Thompson	15.1	240	\$	3,624.00
Diane L. Crivello	4.2	160	\$	672.00
TOTAL	32.4		\$	8,881.00

Claims (006)

<u>Timekeeper</u>	<u>Total Hours</u>	<u>Rate</u>		<u>Total</u>
Christopher R. Thompson	.4	240	\$	96.00
Diane L. Crivello	2.4	160	\$	384.00
TOTAL	2.8		\$	480.00

Secured Creditor (007)

<u>Timekeeper</u>	<u>Total Hours</u>	<u>Rate</u>		<u>Total</u>
Diane L. Crivello	1.0	160	\$	160.00
TOTAL	1.0		\$	160.00

EXHIBIT B

In re: Tireco, Inc.
Case No. 6:15-bk-3459-CCJ

TIME RECORDS

General Representation - 001

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

ATTORNEYS AT LAW

111 N. MAGNOLIA AVE, STE 1400
ORLANDO, FLORIDA 32801
POST OFFICE BOX 3353
ORLANDO, FLORIDA 32802
TELEPHONE: (407) 481-5800
FACSIMILE: (407) 481-5801

May 13, 2015
Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-001
Chapter 11 Bankruptcy

Invoice # 69689
Federal ID # 59-3366512

For Professional Services Rendered:

04/21/2015	CRT	Revise first day motions; emails with M. Jones regarding cash collateral and pre-petition wages motions.	2.50 hr	\$600.00
04/21/2015	CRT	Telephone conference with M. Jones and Justin Luna regarding cash collateral and wages motion; revise first day motions and prepare for filing.	3.50 hr	\$840.00
04/21/2015	CRT	Revise TD Bank cash collateral motion and email to M. Nardella and J. Sykes for review and comment.	0.30 hr	\$72.00
04/21/2015	dlc	Review filing and service of 1st-day motions.	0.40 hr	\$64.00
04/21/2015	JML	Discuss issues regarding filing and file first day motions, discuss same with client.	2.90 hr	\$1,015.00
04/22/2015	dlc	Numerous emails and telephone conferences with courtroom deputy re scheduling 1st day hearings.	0.70 hr	\$112.00
04/22/2015	dlc	Telephone conference with case manager re missing Exhibit A to petition; draft notice of filing and file same.	0.40 hr	\$64.00
04/22/2015	dlc	Draft notice of hearing re 1st day motions; file and serve same.	0.70 hr	\$112.00
04/22/2015	dlc	Prepare hearing binder and exhibit for 1st-day hearings.	0.80 hr	\$128.00
04/24/2015	dlc	Draft orders on payment of prepetition wages and officers compensation.	0.70 hr	\$112.00
04/24/2015	dlc	Receipt and review of Wells Fargo letter to new debtors; correspondence to M Jones re same and providing copies of case commencement notice and orders to retain and operate DIP to allow conversion of bank accounts to DIP accounts.	0.40 hr	\$64.00
04/24/2015	dlc	Telephone conferences with M Jones re opening new DIP accounts; review with JM Luna.	0.20 hr	\$32.00
04/27/2015	dlc	Transmit cash collateral, prepetition wages and officer comp orders to court.	0.30 hr	\$48.00
04/28/2015	dlc	Telephone conference with M Jones re additional creditors and general bankruptcy questions.	0.40 hr	\$64.00
04/30/2015	dlc	Telephone conference with M Jones re general questions on pre and post confirmation issues.	0.40 hr	\$64.00
Total Professional Services:				\$3,391.00

For Disbursements Incurred:

04/30/2015	Check # 41194 Pacer Service Center; Disbursement for 01.01.2015 thru 03.31.2015	\$2.10
04/30/2015	Postage Expense	\$70.35

May 13, 2015
Matter ID: 8126-001

Invoice # 69689
Federal ID # 59-3366512

For Disbursements Incurred:

04/30/2015	Document Reproduction Expense	\$176.00
Total Disbursements Incurred:		\$248.45

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	5.40	\$864.00
JML	\$350.00	2.90	\$1,015.00
CRT	\$240.00	6.30	\$1,512.00

For Professional Services:	14.60 Hours	\$3,391.00
For Disbursements Incurred:		\$248.45
		<u>\$3,639.45</u>
Applied From Trust:		\$3,639.45
Applied From Retainer:		\$0.00
Total this Invoice:		<u>\$0.00</u>

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

ATTORNEYS AT LAW

111 N. MAGNOLIA AVE, STE 1400
ORLANDO, FLORIDA 32801
POST OFFICE BOX 3353
ORLANDO, FLORIDA 32802
TELEPHONE: (407) 481-5800
FACSIMILE: (407) 481-5801

June 05, 2015
Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-001
Chapter 11 Bankruptcy

Invoice # 69865
Federal ID # 59-3366512

For Professional Services Rendered:

05/01/2015	dlc	Numerous emails and telephone conferences with M Jones re going-forward questions.	0.40 hr	\$64.00
05/05/2015	dlc	Correspondence from/to M Jones re ability to hire new employees.	0.20 hr	\$32.00
05/06/2015	dlc	Correspondence from/to M Jones re scheduling IDI; review with J Luna; correspondence to R Lynch confirming date.	0.40 hr	\$64.00
05/07/2015	dlc	Review :US Trustee checklist items still needed.	0.40 hr	\$64.00
05/08/2015	dlc	Receipt and review of officers comp order; serve on parties.	0.30 hr	\$48.00
05/08/2015	dlc	Draft and file proof of service re cash collateral order and officers comp order.	0.30 hr	\$48.00
05/12/2015	dlc	Finalize IDI binder and transmit to R Lynch, UST analyst.	1.90 hr	\$304.00
05/12/2015	dlc	Prepare for and attend IDI.	0.90 hr	\$144.00
05/12/2015	dlc	Correspondence from/to M Jones re IDI and letter from the IRS.	0.30 hr	\$48.00
05/13/2015	JML	Prepare for and attend IDI.	1.30 hr	\$455.00
05/18/2015	CRT	Travel to and attend 341 meeting; meet and discuss meeting with M. Jones	1.80 hr	\$432.00
05/26/2015	dlc	Review with JM Luna requested information by the US Trustee.	0.30 hr	\$48.00
05/27/2015	dlc	Correspondence to M Jones re status of DIP report.	0.20 hr	\$32.00
05/27/2015	dlc	Telephone conference with M Jones re DIP report preparation.	0.30 hr	\$48.00
05/28/2015	dlc	Numerous telephone conferences and correspondence with M Jones re preparation of initial DIP report and review of same.	1.20 hr	\$192.00
05/28/2015	dlc	Review with JM Luna status of pending UST request for information, 1116 filing.	0.30 hr	\$48.00
05/29/2015	dlc	Finalize 2d interim order on officers compensation.	0.30 hr	\$48.00
05/29/2015	dlc	Review and revise officers comp order and prepare for transmittal to court.	0.20 hr	\$32.00
05/29/2015	dlc	Review information provided re Simple IRA; correspondence to M Jones re questions.	0.30 hr	\$48.00
05/29/2015	dlc	Transmit 3 orders to court and file April DIP Report.	0.30 hr	\$48.00

Total Professional Services: \$2,247.00

For Disbursements Incurred:

Filing fee/FL Middle CM ECF/8126-001/JML

June 05, 2015

Matter ID: 8126-001

Invoice # 69865

Federal ID # 59-3366512

For Disbursements Incurred:

05/11/2015		\$30.00
05/28/2015	Check # 41665 FEDEX; Disbursement for FEDEX Inv No 5-036-48736/05.13.15 to Monica Jones w/Formula Tire - from Diane Crivello w/LSEB	\$14.53
05/31/2015	Document Reproduction Expense	\$227.90
05/31/2015	Long Distance Telephone Expense	\$0.04
05/31/2015	Postage Expense	\$68.34
Total Disbursements Incurred:		<u>\$340.81</u>

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	8.50	\$1,360.00
JML	\$350.00	1.30	\$455.00
CRT	\$240.00	1.80	\$432.00

For Professional Services:	11.60 Hours	\$2,247.00
For Disbursements Incurred:		<u>\$340.81</u>
		\$2,587.81
Applied From Trust:		\$2,587.81
Applied From Retainer:		<u>\$0.00</u>
Total this Invoice:		\$0.00

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

ATTORNEYS AT LAW

111 N. MAGNOLIA AVE, STE 1400
ORLANDO, FLORIDA 32801
POST OFFICE BOX 3353
ORLANDO, FLORIDA 32802
TELEPHONE: (407) 481-5800
FACSIMILE: (407) 481-5801

July 09, 2015

Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-001
Chapter 11 Bankruptcy

Invoice # 70081
Federal ID # 59-3366512

For Professional Services Rendered:

06/02/2015	dlc	Research flood plain maps re need to maintain flood insurance.	0.40 hr	\$64.00
06/23/2015	dlc	Review draft of May DIP report and correspondence to M Jones re questions.	0.40 hr	\$64.00
06/24/2015	dlc	Correspondence to/from M Jones re calculating A/R for DIP report purposes.	0.20 hr	\$32.00
06/25/2015	JML	Finalize and file DIP report.	0.30 hr	\$105.00
06/25/2015	dlc	Receipt and review of revised DIP report; calculate cumulative column; telephone conference with M Jones re same.	0.50 hr	\$80.00
06/25/2015	dlc	Additional conversations with M Jones re DIP report, missing balance sheet.	0.20 hr	\$32.00
06/25/2015	dlc	Finalize and file May DIP report.	0.30 hr	\$48.00
Total Professional Services:				<u>\$425.00</u>

For Disbursements Incurred:

06/09/2015	Filing fee/FL Middle CM ECF/8126-001/JML/Schedule Amendment	\$30.00
06/30/2015	Postage Expense	\$119.55
06/30/2015	Document Reproduction Expense	\$615.00
Total Disbursements Incurred:		<u>\$764.55</u>

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	2.00	\$320.00
JML	\$350.00	0.30	\$105.00

July 09, 2015

Matter ID: 8126-001

Invoice # 70081

Federal ID # 59-3366512

For Professional Services:	2.30 Hours	\$425.00
For Disbursements Incurred:		<u>\$764.55</u>
Total Due:		\$1,189.55

Billed Through: June 30, 2015

Schedules - 002

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

ATTORNEYS AT LAW

111 N. MAGNOLIA AVE, STE 1400
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 TELEPHONE: (407) 481-5800
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May 13, 2015
 Tireco, Inc. d/b/a Formula Tire
 2600 W.S.R. 434
 Longwood, FL 32779

INVOICE

Matter ID: 8126-002
 Schedules

Invoice # 69690
 Federal ID # 59-3366512

For Professional Services Rendered:

04/27/2015	JML	Discuss obligations regarding schedules and review documents with D.Crivello.	1.10 hr	\$385.00
04/27/2015	dlc	Telephone conference with M Jones re review of Schedules, SoFA, UST Checklist, DIP report.	1.20 hr	\$192.00
04/28/2015	dlc	Work on schedules and organization of backup documents for UST checklist.	1.60 hr	\$256.00
04/29/2015	dlc	Work on schedules and Statement of Financial Affairs.	1.10 hr	\$176.00
04/30/2015	JML	Discuss issues with schedules with client and opposing counsel.	1.20 hr	\$420.00
Total Professional Services:				\$1,429.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	3.90	\$624.00
JML	\$350.00	2.30	\$805.00

For Professional Services:	6.20 Hours	\$1,429.00
		\$1,429.00
Applied From Trust:		\$1,429.00
Applied From Retainer:		\$0.00
Total this Invoice:		\$0.00

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

ATTORNEYS AT LAW

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June 05, 2015

Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-002
Schedules

Invoice # 69866

Federal ID # 59-3366512

For Professional Services Rendered:

05/04/2015	JML	Finalize and file motion for extension of time to file schedules, discuss same with client.	1.10 hr	\$385.00
05/04/2015	dlc	Work on Schedules and SoFA.	0.80 hr	\$128.00
05/04/2015	dlc	Correspondence to/from M Jones re schedules and continuing preparing schedules.	0.80 hr	\$128.00
05/04/2015	dlc	Draft motion to extend time to file Schedules and SoFA.	0.60 hr	\$96.00
05/04/2015	dlc	Review schedule prep status with JM Luna and draft of schedule extension motion.	0.30 hr	\$48.00
05/05/2015	dlc	File and serve motion to extend time to file Schedules.	0.60 hr	\$96.00
05/05/2015	dlc	Continue schedule preparation.	0.80 hr	\$128.00
05/06/2015	dlc	Telephone conference with M Jones re schedule and UST checklist questions, fees, etc.	0.80 hr	\$128.00
05/07/2015	dlc	Continue review of schedules and SoFA.	0.80 hr	\$128.00
05/11/2015	dlc	Finalize schedule preparation and file Schedules and SoFA.	0.90 hr	\$144.00
05/11/2015	dlc	File and serve notice of additional creditors.	0.40 hr	\$64.00
05/11/2015	JML	Finalize and file schedules and statement of financial affairs.	1.00 hr	\$350.00
05/11/2015	dlc	Review schedules, SoFA, and US Trustee checklist preparation with JM Luna; revise same; and correspondence to M Jones re missing items.	0.80 hr	\$128.00
05/11/2015	dlc	Draft motion to correct/add creditor addresses with filing of Schedules; review and create matrix.	0.50 hr	\$80.00
05/12/2015	JML	Prepare for IDI and 341, discuss with D.Crivello.	0.30 hr	\$105.00
05/28/2015	dlc	Correspondence to M Jones re status of schedule amendment.	0.20 hr	\$32.00

Total Professional Services: \$2,168.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	8.30	\$1,328.00
JML	\$350.00	2.40	\$840.00

June 05, 2015

Matter ID: 8126-002

Invoice # 69866

Federal ID # 59-3366512

For Professional Services:	10.70 Hours	\$2,168.00
		<hr/>
		\$2,168.00
Applied From Trust:		\$957.74
Applied From Retainer:		\$0.00
		<hr/>
Total this Invoice:		\$1,210.26

LATHAM, SHUKER, EDEN & BEAUDINE, LLP
ATTORNEYS AT LAW

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July 09, 2015

Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-002
Schedules

Invoice # 70082
Federal ID # 59-3366512

For Professional Services Rendered:

06/01/2015	dlc	Work on schedule amendment.	0.50 hr	\$80.00
06/02/2015	dlc	Receipt and review of information on IRA payments due.	0.40 hr	\$64.00
06/02/2015	dlc	Correspondence to M Jones sre status of IRA information.	0.20 hr	\$32.00
06/03/2015	dlc	Review with JM Luna questions on IRA contributions; additional correspondence to M Jones re clarification.	0.30 hr	\$48.00
06/03/2015	dlc	Additional revisions to schedule amendment and correspondence to M Jones re IRA questions.	0.40 hr	\$64.00
06/04/2015	dlc	Additiional update to schedule amendment, review with JM Luna, and correspondence with M Jones re same.	0.70 hr	\$112.00
06/05/2015	dlc	Finalize schedule amendment with revised IRS contribution for JM Jones.	0.40 hr	\$64.00
06/09/2015	dlc	Prepare for filing, file and serve schedule amendment.	0.70 hr	\$112.00

Total Professional Services: \$576.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	3.60	\$576.00

July 09, 2015

Matter ID: 8126-002

Invoice # 70082

Federal ID # 59-3366512

For Professional Services:	3.60 Hours	<u>\$576.00</u>
New Charges this Invoice:		<u>\$576.00</u>

Previous Balance:		\$1,210.26
Less Payment and Credits Received:		<u>\$0.00</u>
Outstanding Balance:		\$1,210.26
Plus New Charges this Invoice:		<u>\$576.00</u>
Total Due:		<u>\$1,786.26</u>

Billed Through: June 30, 2015

41

Cash Collateral (003)

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

ATTORNEYS AT LAW

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May 13, 2015
Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-003
Cash Collateral

Invoice # 69691
Federal ID # 59-3366512

For Professional Services Rendered:

04/24/2015	dlc	Review and revise cash collateral order with hearing ruling.	0.40 hr	\$0.00
04/24/2015	dlc	Numerous calls with case manager re correction to cash collateral motion (re TD Bank).	0.50 hr	\$80.00
04/24/2015	CRT	Revise TD Bank cash collateral motion and prepare for filing	0.50 hr	\$120.00
04/28/2015	dlc	Review status of hearing schedule for TD Bank cash collateral motion.	0.20 hr	\$32.00
Total Professional Services:				\$232.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$0.00	0.40	\$0.00
dlc	\$160.00	0.70	\$112.00
CRT	\$240.00	0.50	\$120.00

For Professional Services: 1.60 Hours \$232.00

	\$232.00
Applied From Trust:	\$232.00
Applied From Retainer:	\$0.00
Total this Invoice:	\$0.00

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

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June 05, 2015
Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-003
Cash Collateral

Invoice # 69867
Federal ID # 59-3366512

For Professional Services Rendered:

05/01/2015	dlc	Receipt of notice to prepare hearing notice on TD Bank cash collateral motion; draft and file same.	0.50 hr	\$80.00
05/08/2015	dlc	Receipt and review of cash collateral order re SunTrust; serve on parties.	0.30 hr	\$48.00
05/13/2015	CRT	Office conference with Justin Luna regarding IDI and hearing on motion to use cash collateral.	0.20 hr	\$48.00
05/13/2015	CRT	Prepare for cash collateral hearing.	0.30 hr	\$72.00
05/14/2015	CRT	Prepare for cash collateral hearing; emails with M. Nardella regarding cash collateral hearing; revise proposed order and email to Judge Jackson's assistant.	1.00 hr	\$240.00
05/15/2015	dlc	Receipt and review of order on use of TD Bank cash collateral; draft and file POS and serve order.	0.80 hr	\$128.00
05/22/2015	CRT	Emails with M. Nardella regarding adequate protection payments.	0.20 hr	\$48.00
05/26/2015	CRT	Emails with M. Nardella regarding TD Bank adequate protection payments.	0.10 hr	\$24.00
05/26/2015	CRT	Email M. Jones regarding payment to TD Bank.	0.10 hr	\$24.00
05/27/2015	CRT	Telephone conferences with M. Jones regarding cash collateral budget; Office conference with D. Crivello regarding cash collateral budget.	0.30 hr	\$72.00
05/27/2015	CRT	Office conference with D. Crivello regarding cash collateral budget; email M. Jones regarding same.	0.20 hr	\$48.00
05/27/2015	dlc	Update and prepare budget exhibit for cash collateral hearing.	0.70 hr	\$112.00
05/28/2015	CRT	Attend cash collateral hearing.	0.20 hr	\$48.00
05/28/2015	JML	Prepare for and attend hearing on cash collateral.	1.40 hr	\$490.00
05/29/2015	dlc	Draft 2d interim orders on use of cash collateral for TD Bank and SunTrust Bank.	0.80 hr	\$128.00
05/29/2015	dlc	Review and revise cash collateral orders and prepare for transmittal to court.	0.40 hr	\$64.00
Total Professional Services:				<u>\$1,674.00</u>

June 05, 2015

Matter ID: 8126-003

Invoice # 69867

Federal ID # 59-3366512

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	3.50	\$560.00
JML	\$350.00	1.40	\$490.00
CRT	\$240.00	2.60	\$624.00

For Professional Services:	7.50 Hours	\$1,674.00
Total this Invoice:		\$1,674.00

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

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July 09, 2015

Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-003
Cash Collateral

Invoice # 70083
Federal ID # 59-3366512

For Professional Services Rendered:

06/08/2015	dlc	Serve orders on use of cash collateral re TD Bank and SunTrust.	0.40 hr	\$64.00
06/08/2015	dlc	Draft proof of service re 2 cash collateral orders and order to pay officers; file same.	0.40 hr	\$64.00
Total Professional Services:				\$128.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	0.80	\$128.00

For Professional Services:	0.80 Hours	\$128.00
New Charges this Invoice:		\$128.00
Previous Balance:		\$1,674.00
Less Payment and Credits Received:		\$0.00
Outstanding Balance:		\$1,674.00
Plus New Charges this Invoice:		\$128.00
Total Due:		\$1,802.00

Billed Through: June 30, 2015

Professional Retention - 004

LATHAM, SHUKER, EDEN & BEAUDINE, LLP
ATTORNEYS AT LAW

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May 13, 2015
Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-004
Professional

Invoice # 69692
Federal ID # 59-3366512

For Professional Services Rendered:

04/27/2015	dlc	Draft LSEB employment application, 2014 and 2016 statements.	1.10 hr	\$176.00
04/30/2015	dlc	Review and revise LSEB application to employ and 2014, 2016 statements and correspondence to M Jones re execution of same.	0.70 hr	\$112.00
Total Professional Services:				<u>\$288.00</u>

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	1.80	\$288.00

For Professional Services: 1.80 Hours \$288.00

	<u>\$288.00</u>
Applied From Trust:	\$288.00
Applied From Retainer:	\$0.00
Total this Invoice:	<u>\$0.00</u>

LATHAM, SHUKER, EDEN & BEAUDINE, LLP
ATTORNEYS AT LAW

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June 05, 2015
Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-004
Professional

Invoice # 69868
Federal ID # 59-3366512

For Professional Services Rendered:

05/01/2015	dlc	File and serve LSEB application to employ.	0.80 hr	\$128.00
Total Professional Services:				\$128.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	0.80	\$128.00

For Professional Services:	0.80 Hours	\$128.00
Total this Invoice:		\$128.00

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

ATTORNEYS AT LAW

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July 09, 2015

Tireco, Inc. d/b/a Formula Tire
 2600 W.S.R. 434
 Longwood, FL 32779

INVOICE

Matter ID: 8126-004
 Professional

Invoice # 70084
 Federal ID # 59-3366512

For Professional Services Rendered:

06/29/2015	dlc	Begin preparation of LSEB fee application.	0.80 hr	\$128.00
06/30/2015	dlc	Begin fee calculations.	0.60 hr	\$96.00
Total Professional Services:				\$224.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	1.40	\$224.00

For Professional Services: 1.40 Hours \$224.00

New Charges this Invoice: \$224.00

Previous Balance: \$128.00

Less Payment and Credits Received: \$0.00

Outstanding Balance: \$128.00

Plus New Charges this Invoice: \$224.00

Total Due: \$352.00

Billed Through: June 30, 2015

Plan of Reorganization - 005

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

ATTORNEYS AT LAW

111 N. MAGNOLIA AVE, STE 1400
ORLANDO, FLORIDA 32801
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May 13, 2015
Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-005
Plan of Reorganization

Invoice # 69693
Federal ID # 59-3366512

For Professional Services Rendered:

04/22/2015	JML	Begin preparation of filing disclosure statement and plan.	2.10 hr	\$735.00
04/28/2015	JML	Begin to prepare plan of reorganization, discuss same with client.	1.10 hr	\$385.00
04/29/2015	JML	Continue drafting plan of reorganization.	0.80 hr	\$280.00
Total Professional Services:				\$1,400.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
JML	\$350.00	4.00	\$1,400.00

For Professional Services: 4.00 Hours \$1,400.00

	\$1,400.00
Applied From Trust:	\$1,400.00
Applied From Retainer:	\$0.00
Total this Invoice:	\$0.00

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

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June 05, 2015
Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-005
Plan of Reorganization

Invoice # 69869
Federal ID # 59-3366512

For Professional Services Rendered:

05/01/2015	JML	Continue formulating plan and disclosure statement.	1.10 hr	\$385.00
05/04/2015	CRT	Draft plan and disclosure statement	0.80 hr	\$192.00
05/07/2015	JML	Continue drafting plan and disclosure statement.	1.10 hr	\$385.00
05/12/2015	CRT	Draft disclosure statement.	0.70 hr	\$168.00
05/12/2015	CRT	Draft disclosure statement.	1.80 hr	\$432.00
05/13/2015	CRT	Draft disclosure statement.	1.80 hr	\$432.00
05/15/2015	JML	Discuss plan with client and opposing counsel.	0.60 hr	\$210.00
05/21/2015	CRT	Draft plan of reorganization	1.20 hr	\$288.00
05/22/2015	CRT	Email Monica Jones regarding plan projections.	0.20 hr	\$48.00
05/26/2015	JML	Edit and revise plan and disclosure statement.	1.50 hr	\$525.00
05/26/2015	CRT	Office conference with Justin Luna regarding plan and projections.	0.20 hr	\$48.00
05/26/2015	CRT	Revise plan and disclosure statement.	0.80 hr	\$192.00
05/26/2015	CRT	Draft liquidation analysis for disclosure statement.	0.40 hr	\$96.00
05/27/2015	dlc	Review plan status with JM Luna and correspondence to M Jones re status of projections.	0.30 hr	\$48.00
05/27/2015	CRT	Revise plan and disclosure statement per Justin Luna edits.	0.80 hr	\$192.00
05/28/2015	CRT	Revise plan and disclosure statement per Justin Luna edits.	1.00 hr	\$240.00
05/28/2015	CRT	Office conference with M. Jones and Justin Luna regarding plan and projections.	0.50 hr	\$120.00
05/28/2015	JML	Finalize plan of reorganization, discuss same with client.	1.20 hr	\$420.00

Total Professional Services: \$4,421.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	0.30	\$48.00
JML	\$350.00	5.50	\$1,925.00
CRT	\$240.00	10.20	\$2,448.00

June 05, 2015

Matter ID: 8126-005

Invoice # 69869

Federal ID # 59-3366512

For Professional Services:	16.00 Hours	<u>\$4,421.00</u>
Total this invoice:		\$4,421.00

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

ATTORNEYS AT LAW

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July 09, 2015

Tireco, Inc. d/b/a Formula Tire
 2600 W.S.R. 434
 Longwood, FL 32779

INVOICE

Matter ID: 8126-005
 Plan of Reorganization

Invoice # 70085
 Federal ID # 59-3366512

For Professional Services Rendered:

06/01/2015	CRT	Email D. Crivello regarding plan projections.	0.20 hr	\$48.00
06/01/2015	CRT	Email D. Crivello regarding plan projections.	0.20 hr	\$48.00
06/01/2015	CRT	Office conference with D. Crivello regarding plan projections.	0.20 hr	\$48.00
06/01/2015	CRT	Review revised plan projections.	0.30 hr	\$72.00
06/01/2015	dlc	Review and revise projections for Plan.	0.90 hr	\$144.00
06/02/2015	dlc	Draft motion to combine hearing on disclosure statement and confirmation of plan.	0.50 hr	\$80.00
06/02/2015	CRT	Review plan projections.	0.30 hr	\$72.00
06/03/2015	JML	Prepare and finalize plan and disclosure statement.	2.50 hr	\$875.00
06/03/2015	CRT	Office conference with Justin Luna regarding plan projections; email M. Jones regarding plan projections.	0.30 hr	\$72.00
06/04/2015	JML	Discuss issues regarding projections and amendments to schedules with client.	0.40 hr	\$140.00
06/08/2015	JML	Discuss and review projections with client.	0.30 hr	\$105.00
06/11/2015	CRT	Email M. Nardella regarding payment of attorneys' fees at closing.	0.20 hr	\$48.00
06/11/2015	CRT	Email M. Nardella regarding payment of closing costs.	0.20 hr	\$48.00
06/15/2015	JML	Finalize projections with client.	0.40 hr	\$140.00
06/16/2015	CRT	Review and revise plan, disclosure statement, and exhibits for filing.	2.40 hr	\$576.00
06/16/2015	CRT	Telephone Conference with M. Nardella regarding plan and disclosure statement; email Justin Luna regarding same.	0.50 hr	\$120.00
06/17/2015	CRT	Office Conference with Justin Luna regarding motion to combine hearing on confirmation and disclosure statement.	0.10 hr	\$24.00
06/22/2015	dlc	Correspondence to/from L Lewis re scheduling confirmation hearing; schedule same.	0.30 hr	\$48.00
06/23/2015	dlc	Receipt and review of order scheduling confirmation; calculate and schedule due dates.	0.40 hr	\$64.00
06/24/2015	dlc	Work on preparation of solicitation package.	0.50 hr	\$80.00
06/25/2015	dlc	Work on preparation and service of Solicitation package.	0.50 hr	\$80.00
06/25/2015	dlc	Review solicitation package with JM Luna.	0.20 hr	\$32.00

July 09, 2015

Matter ID: 8126-005

Invoice # 70085

Federal ID # 59-3366512

For Professional Services Rendered:

06/25/2015	dlc	Telephone conference with M Jones re confirmation schedule and need to attend.	0.20 hr	\$32.00
06/29/2015	dlc	File certificate of service re Solicitation package.	0.40 hr	\$64.00
			Total Professional Services:	<u>\$3,060.00</u>

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	3.90	\$624.00
JML	\$350.00	3.60	\$1,260.00
CRT	\$240.00	4.90	\$1,176.00

For Professional Services:	12.40 Hours	<u>\$3,060.00</u>
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New Charges this Invoice:		<u>\$3,060.00</u>
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Previous Balance:	\$4,421.00
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Less Payment and Credits Received:	<u>\$0.00</u>
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Outstanding Balance:	\$4,421.00
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Plus New Charges this Invoice:	<u>\$3,060.00</u>
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Total Due:	<u>\$7,481.00</u>
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Billed Through: June 30, 2015

Claims - 006

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

ATTORNEYS AT LAW

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May 13, 2015
Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-006
Claims

Invoice # 69694
Federal ID # 59-3366512

For Professional Services Rendered:

04/30/2015	dlc	Receipt and review of FI DOR claim for sales/use tax.	0.30 hr	\$48.00
04/30/2015	dlc	Correspondence to M Jones re FL DOR sales and use tax claim review.	0.20 hr	\$32.00
Total Professional Services:				\$80.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	0.50	\$80.00

For Professional Services: 0.50 Hours \$80.00

	\$80.00
Applied From Trust:	\$80.00
Applied From Retainer:	\$0.00
Total this Invoice:	\$0.00

LATHAM, SHUKER, EDEN & BEAUDINE, LLP
ATTORNEYS AT LAW

111 N. MAGNOLIA AVE, STE 1400
ORLANDO, FLORIDA 32801
POST OFFICE BOX 3353
ORLANDO, FLORIDA 32802
TELEPHONE: (407) 481-5800
FACSIMILE: (407) 481-5801

June 05, 2015
Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-006
Claims

Invoice # 69870
Federal ID # 59-3366512

For Professional Services Rendered:

05/06/2015	dlc	Receipt and review of SunTrust proof of claim; update Schedules with revised address.	0.30 hr	\$48.00
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Total Professional Services: \$48.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	0.30	\$48.00

For Professional Services: 0.30 Hours \$48.00

Total this Invoice: \$48.00

LATHAM, SHUKER, EDEN & BEAUDINE, LLP

ATTORNEYS AT LAW

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ORLANDO, FLORIDA 32801
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TELEPHONE: (407) 481-5800
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July 09, 2015

Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-006
Claims

Invoice # 70086
Federal ID # 59-3366512

For Professional Services Rendered:

06/03/2015	dlc	Begin preparation of claims analysis chart.	0.60 hr	\$96.00
06/30/2015	dlc	Receipt and review of lawsuit filed by Tire Centers LLC; draft suggestion of bankruptcy re same; file and serve same.	0.70 hr	\$112.00
06/30/2015	CRT	Review state court complaint of Tire Centers, LLC; email counsel for Tire Centers regarding automatic stay violation.	0.40 hr	\$96.00
06/30/2015	dlc	Research inclusion of Tire Centers on schedules and review with CR Thompson.	0.30 hr	\$48.00
Total Professional Services:				\$352.00

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	1.60	\$256.00
CRT	\$240.00	0.40	\$96.00

For Professional Services:	2.00 Hours	\$352.00
New Charges this Invoice:		\$352.00
Previous Balance:		\$48.00
Less Payment and Credits Received:		\$0.00
Outstanding Balance:		\$48.00
Plus New Charges this Invoice:		\$352.00
Total Due:		\$400.00

Billed Through: June 30, 2015

Secured Creditor (007)

LATHAM, SHUKER, EDEN & BEAUDINE, LLP
ATTORNEYS AT LAW

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ORLANDO, FLORIDA 32801
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ORLANDO, FLORIDA 32802
TELEPHONE: (407) 481-5800
FACSIMILE: (407) 481-5801

June 05, 2015
Tireco, Inc. d/b/a Formula Tire
2600 W.S.R. 434
Longwood, FL 32779

INVOICE

Matter ID: 8126-007
Secured Creditors

Invoice # 69871
Federal ID # 59-3366512

For Professional Services Rendered:

05/04/2015	dlc	File and serve Suggestion of Bankruptcy in State Court Case.	0.50 hr	\$80.00
05/04/2015	dlc	Draft suggestion of bankruptcy re TD Bank state court case; research case status.	0.50 hr	\$80.00
Total Professional Services:				<u>\$160.00</u>

INVOICE SUMMARY

<u>Producer</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
dlc	\$160.00	1.00	\$160.00

For Professional Services:	1.00 Hours	<u>\$160.00</u>
Total this Invoice:		\$160.00

EXHIBIT C

In re: Tireco, Inc.
Case No. 6:15-bk-3459-CCJ

EXPENSES/COSTS

Document Reproduction Expense	\$	1,018.90
Filing Fees	\$	60.00
Postage	\$	258.24
Telephone (long distance)	\$	0.04
TOTAL	\$	1,337.18

Excluded charges:

PACER - \$2.10

EXHIBIT D

In re: Tireco, Inc.
Case No. 6:15-bk-3459-CCJ

AFFIDAVIT

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

In re:

CASE NO. 6:15-bk-3459-CCJ

TIRECO, INC.,

CHAPTER 11

Debtor.

**HEARING ON CONFIRMATION SCHEDULED
FOR THURSDAY, AUGUST 13, 2015 AT 2:00 P.M.**

**AFFIDAVIT IN SUPPORT OF FINAL APPLICATION OF JUSTIN M. LUNA
AND THE LAW FIRM OF LATHAM, SHUKER, EDEN & BEAUDINE, LLP,
FOR AWARD OF ATTORNEYS' FEES i/a/o \$22,303.00
AND REIMBURSEMENT OF EXPENSES i/a/o \$1,337.18
NOTICE OF ESTIMATED FEES THROUGH CONFIRMATION i/a/o \$7,000.00**

STATE OF FLORIDA)
)
COUNTY OF ORANGE)

BEFORE ME, the undersigned authority, personally appeared Justin M. Luna, who, being duly sworn, deposes and says:

1. I am a partner with Latham, Shuker, Eden & Beaudine, LLP (“Latham Shuker”), a Florida limited liability partnership engaged in the practice of law, and in that capacity have knowledge of the books and records of Latham Shuker relating to the matter set forth herein, which books and records are kept and maintained by Latham Shuker in the ordinary course of its business.

I make this affidavit based upon personal knowledge of the matters set forth herein.

2. I am the billing and responsible attorney assigned by Latham Shuker to represent the Debtor.

3. I have reviewed the foregoing Final Application for Award of Attorneys' Fees and Reimbursement of Expenses filed concurrent herewith, and all attachments accurately reflect the time and expenses of Latham Shuker for the periods set forth herein for representation of the Debtor.

4. I verify under penalty of perjury that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NOT.



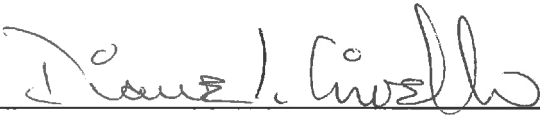
JUSTIN M. LUNA

STATE OF FLORIDA)
COUNTY OF ORANGE)

Sworn to and subscribed before me this 20TH day of July 2015 by **Justin M. Luna**, who is personally known to me.



[NOTARY SEAL]



Signature of Person Taking Acknowledgment
Print Name: _____
Title: Notary Public
Serial No. (if any) _____
Commission Expires: _____